

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

AMPEX CORPORATION,

*Plaintiff,*

Y.

EASTMAN KODAK COMPANY,  
ALTEK CORPORATION, and  
CHINON INDUSTRIES, INC.,

*Defendants.*

C.A. No. 04-1373 (KAJ)

**AMPEX CORPORATION'S MOTION FOR PARTIAL SUMMARY JUDGMENT  
THAT U.S. PATENT NO. 4,821,121 IS NOT INVALID FOR OBVIOUSNESS**

Pursuant to Fed. R. Civ. P. 56, Plaintiff Ampex Corporation (“Ampex”) hereby moves for partial summary judgment that the patent-in-suit, U.S. Patent No. 4,821,121, is not invalid for obviousness based on seven combinations of alleged prior art that Kodak alleges to invalidate. The grounds for this motion are set forth in Ampex Corporation’s Opening Brief In Support Of Motion For Partial Summary Judgment That U.S. Patent No. 4,821,121 Is Not Invalid For Obviousness, filed herewith.

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May 23, 2006

**CERTIFICATE OF SERVICE**

I, Julia Heaney, hereby certify that on May 23, 2006, I caused to be electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

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